#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

<i>y</i>	
In re	
THE FINANCIAL OVERSIGHT AND	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, :	Title III
as representative of	Case No. 17-BK-3283-LTS
THE COMMONWEALTH OF PUERTO RICO, et : al. :	Court Filing Relates Only to PREPA
Debtor.	
:	
In re	
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	PROMESA Title III
as representative of :	Case No. 17-4780-LTS
PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA), <sup>1</sup>	(Jointly Administered)
Debtor.	
: X	<b>S</b>

#### **MOTION TO INFORM TRANSFER OF CLAIM**

**COMES NOW** Cedar Glade LP ("<u>Cedar Glade</u>"), by and through the undersigned legal counsel, and respectfully informs the Court as follows:

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

- 1. On July 2, 2017, PREPA, by and through the Financial Oversight and Management Board for Puerto Rico<sup>2</sup>, filed a petition under title III of PROMESA (the "<u>Title III</u> <u>Case</u>") before the United States District Court for the District of Puerto Rico.
- 2. On June 12, 2018, Environics Engineering Group Corp. ("Environics") filed Proof of Claim No. 63950 in the amount of \$967,946.57 (the "Proof of Claim") in the Title III Case.
- 3. On July 1, 2022, Environics sold, transferred, and assigned all of its rights, title, and interest in the Proof of Claim to Cedar Glade, as set forth in **Exhibit A** hereto.

WHEREFORE, pursuant to Rule 3001(e) of the Federal Rules of Bankruptcy Procedure, Movant requests that the title and ownership of Proof of Claim No. 63950 be transferred from Environics to Cedar Glade, and that the claims register correctly identify Cedar Glade as the title holder and current owner of the Proof of Claim.

[Remainder of page intentionally left blank]

<sup>&</sup>lt;sup>2</sup> As PREPA's representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* ("PROMESA")

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of August 2022.

**CERTIFICATE OF SERVICE**: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 20190-1) (the "<u>CMP Order</u>"), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

#### Attorneys for Cedar Glade LP

#### MCCONNELL VALDÉS LLC

270 Muñoz Rivera Avenue, Suite 7 Hato Rey, Puerto Rico 00918 Telephone: 787-250-5632 Facsimile: 787-759-9225

By: /s/Nayuan Zouairabani

Nayuan Zouairabani USDC No. 226411 Email: nzt@mcvpr.com 

## Exhibit A

Case:17-03283-LTS Doc#:21996 Filed:08/31/22 Entered:08/31/22 14:13:27 Desc: Main Document Page 5 of 8

#### UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY.

Debtor.

PROMESA Title III Case No. 17-03283 (LTS)

(Jointly Administered)

PROMESA Title III Case No. 17-04780 (LTS)

(Jointly Administered)

#### MOTION TO INFORM REGARDING TRANSFER OF CLAIM PURSUANT TO RULE 3001(e)

PLEASE TAKE NOTICE that the claim #63950-1 asserted by ENVIRONICS ENGINEERING GROUP CORP. ("Assigno-") against the Debtor PUERTO RICO ELECTRIC POWER AUTHORITY in the filed amount of \$967,946.00 and all claims of Assignor against Debtor have been transferred and assigned to CEDAR GLADE LP ("Assignee"). The signature of Assignor on this document is evidence of the transfer of the claims and all rights thereto.

I, the undersigned Assignor of the claim described above, hereby assign and transfer my claims and all rights thereto according to the terms of the Transfer of Claim agreement duly executed by me on the date hereof. I have a claim against the Debtor that has not been previously transferred. The clerk of this Court is authorized to change the address of record regarding the claim to that of Assignee listed below.

#### CEDAR GLADE LP

Name of Assignee

Address: 600 Madison Avenue, 17th Floor

New York, NY 10022

Name: Robert Minkoff Title: President

Date: July 1, 2022

**ENVIRONICS ENGINEERING GROUP** 

CORP.

Name of Assignor Address: PO Box 29535 San Juan, PR 00929

By: Name: Thomas J. Danner

Title: President Date: June 30, 2022 Case:17-03283-LTS Doc#:21996 Filed:08/31/22 Entered:08/31/22 14:13:27 Desc: Main Document Page 6 of 8

# UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III Case No. 17-03283 (LTS)

(Jointly Administered)

PROMESA Title III

Case No. 17-04780 (LTS)

(Jointly Administered)

#### TRANSFER OF CLAIM OTHER THAN FOR SECURITY

A CLAIM HAS BEEN FILED IN THIS CASE or deemed filed under 11 U.S.C. § 1111(a). Transferee hereby gives evidence and notice pursuant to Rule 3001(e)(2) of the Federal Rules of Bankruptcy Procedure of the transfer, other than for security, of the claim referenced in this evidence and notice.

Cedar Glade LP
Name of Transferee

Last Four Digits of Acct #: N/A

Address where notices and payments to Transferee should be sent:

600 Madison Avenue, 17th Floor New Yor's, NY 10022 Environics Engineering Group Corp.

Name of Transferor

Last Four Digits of Acct #: N/A

Claim No: 63950-1 Case No.: 17-04780

Date Filed: 06/12/2018

Total Amount of Claim: \$967,946.57 Transferred Amount of Claim: \$121,572.00

I declare under penalty of perjury that the information provided in this notice is true and correct to the best of my

knowledge and belief.

Transferee/Transferee's Agent

Date: July 1 . 2022

Penalty for making a false statement: Fine of up to \$500,000 or imprisonment for up to 5 years, or both, 18 U.S.C. §§ 152 & 3571.

S. Talley

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#### **SCHEDULE 1**

#### NOTICE ADDRESSES AND WIRE INSTRUCTIONS

Seller's Address for Notices: ENVIRONICS ENGINEERING GROUP CORP. PO Box 29535 San Juan, PR 00929 Attn: Thomas Danner

### Seller's Wire Instructions:

Bank Name:

ABA/Routing Number:

Account Name: Account Number:

Buyer's Address for Notices: CEDAR GLADE LP 600 Madison Avenue, 17th Floor New York, NY 10022 Attn: Robert Minkoff

Buyer's Wire Instructions:

Bank Name:

ABA/Routing Number:

Account Name:

Account Number: